

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**UNITED STATES OF AMERICA,**

**v.**

**SALVATORE J. LEONE,**

**Defendant.**

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**Case No.: 13-95-GMS**

**MOTION TO TERMINATE PROBATION**

**DEFENDANT**, Salvatore J. Leone, by and through undersigned counsel, pursuant to Rule 7.1, General Rules, U.S. District Court – District of Delaware, and Title 18, United States Code, Section 3564 (c), respectfully requests this Court to terminate his probation, and states:

1. On October 7, 2013, Defendant was charged with the offense of Conspiracy to Commit Bank Fraud.
2. Defendant pled guilty of said offense, and in pertinent part, placed on a period of probation for three (3) years, ordered to pay fines, restitution and a special monetary assessment.
3. As a special condition of probation, Defendant was ordered to pay restitution to the named recipients in the amount of \$784,568.00.
4. To date, Defendant has successfully completed all terms and conditions of his probation except payment in full of all restitution amounts.  
  
Defendant pays \$500.00 per month to the United States District Court for the District of Delaware.

5. Defendant's probation officer, Amy Docherty, acknowledges Defendant has complied with all terms and does not oppose such a motion.

**CERTIFICATE OF CONSULTATION**

Pursuant to Local Rule 7.1, Counsel advises the Court that the above request was presented to the Government in a good faith effort to resolve by agreement that issues raised herein. The Government concurs with this Motion and request.

**WHEREFORE**, Defendant requests this Court to terminate his probation.

**I HEREBY CERTIFY** that a true copy hereof has been furnished to Robert Kravitz, AUSA, U.S. Attorney's Office, 1007 North Orange Street, P.O. Box 2046, Wilmington, DE 19899-2046 via regular U.S. Mail, this 10<sup>th</sup> day of October, 2018 and via CM/ECF E-filing system.

Respectfully submitted,

**LIGUORI & MORRIS**

/s/ James E. Liguori  
**JAMES E. LIGUORI, ESQUIRE**  
**BAR ID NO.: 415**  
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Attorney for Defendant

DATED: October 10, 2018

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**ORDER OF DISCHARGE AND DISMISSAL UNDER 18 U.S.C. § 3607 (a)**

The supervising probation officer reports that the Defendant has complied with the conditions of probation and recommends discharge from probation.

**IT IS ORDERED:** The Defendant is discharged from probation, and the proceedings are dismissed without a judgment of conviction.

Date: \_\_\_\_\_

\_\_\_\_\_  
Judge's signature

\_\_\_\_\_  
Printed name and title